

FACT SHEET FOR STATE WASTE DISCHARGE PERMIT NO. ST 6188
I.P. CALLISON AND SONS

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST6188. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to the City of Chehalis Wastewater Treatment Plant. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix C—Response to Comments.

GENERAL INFORMATION	
Applicant	I.P. Callison and Sons, a division of Callison Inc.
Facility Name and Address	799 N. National Avenue, Chehalis Washington 98532
Type of Facility	Mint Oil Production
Facility Discharge Location	Latitude: 46° 40' 32" N Longitude: 122° 58' 20" W. Could not be confirmed by GPS
Treatment Plant Receiving Discharge	City of Chehalis Wastewater Treatment Plant
Contact at Facility	Name: Gregory C. Biza Telephone #: (360) 748-3315
Responsible Official	Name: Gregory C. Biza Title: Vice President and Technical Director Address: 799 N. National Avenue Telephone #:(360) 748-3315 FAX # (360) 748-0421

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

This facility distills and blends mint oils for flavoring. It is not a Significant Industrial User, given that its daily flow is 1300 gpd. The threshold for classification of Significant Industrial User (SIU) is either 25,000 gallons per day or 5 percent of the POTW capacity (200,000 gpd). There are no categorical standards for this activity.

HISTORY

This facility is housed in a former lumber mill. It was converted to its present use prior to the issuance of its first permit in the 1970s. This permit and subsequent permits were NPDES permits to discharge pollutants into Salzer Creek, a tributary to the Chehalis River. The path of the discharge was from the plant through a side sewer to a storm drain in State Street. This storm drain discharged into a wetland alongside the railroad track. From this wetland, the railroad ditch conveyed the water to Salzer Creek. The primary pollutant monitored has always been temperature. The removal of the non-contact cooling water from this waste stream will assure that no significant temperature problems remain.

The NPDES permit issued on March 31, 2000 required that the permittee install a cooling tower to reduce the volume of cooling water discharge to the environment. The compliance schedule for this installation was not met.

A storm water permit inspection on October 8, 2001, showed that water from the drum washing facility was being discharged to the city sewer.

As a result of these conditions, the permittee has agreed to:

1. Install the cooling tower.
2. Cease discharge to the storm drain and Salzer Creek.
3. Route the boiler blowdown to the city sewer.
4. Route the cleanup water from the production room to the city sewer.
5. Route the drum washwater to the city sewer.

These changes will require the issuance of this permit, issued under the authority of WAC 173-216.

In addition to these waste streams, the permittee will need to discharge cooling water at intervals to the City sewer as mineral buildup in the cooling water requires its discharge.

INDUSTRIAL PROCESSES

I.P. Callison and Sons distills and blends mint oils distilled elsewhere. These oils are used in flavoring. Production is reported as 3,800,000 pounds per year. The facility operates 2 shifts, 16 hours per day, 5 days per week, 52 weeks per year. Miscellaneous chemicals stored here are paint, lab glass cleaner, expended oil and boiler chemicals. The Permittee proposes to reduce water use to an average of 1300 gallons per day from the current average use of 28,000 gallons per day by implementing steps 3, 4, and 5 in "History" above. This is a replacement for an NPDES permit.

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TREATMENT PROCESSES

This facility has no waste water treatment system beyond best management practices.

PERMIT STATUS

The previous permit for this facility was issued on March 31, 2000.

An application for permit revision and replacement was submitted to the Department on April 26, 2002, and accepted by the Department on June 3, 2002.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received an inspection on October 8, 2001.

During the history of the previous permit, the Permittee has not remained in compliance with the permit. This has resulted in the issuance of an Administrative Order on February 11, 2002, and an amended Administrative Order on May 10, 2002. These orders are attached as Appendix D.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge is presently not known since the reconfiguration of the waste water system is new. An approximation of wastewater characteristics can be obtained from an analysis of the boiler water as shown below.

Parameter		Unit	Detection Limit	Concentration
Cyanide	µg/L		40	Non-Detect
pH	S.U.		0	10.2
Mercury	µg/L		0.2	Non-Detect
Arsenic	µg/L		5	Non-Detect
Cadmium	µg/L		2	Non-Detect
Chromium	µg/L		5	Non-Detect
Copper	µg/L		5	52
Lead	µg/L		5	Non-Detect
Nickel	µg/L		5	Non-Detect
Selenium	µg/L		5	Non-Detect
Silver	µg/L		5	Non-Detect
Zinc	µg/L		5	220

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

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The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). There are no federal categorical limits for this industry.

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the Chehalis Sewage Treatment Plant from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by the Chehalis Sewage Treatment Plant and codified in ordinance. Applicable limits for this discharge include the following:

Parameter	Average Monthly^a	Maximum Daily^b
Flow, gpd	1300	1300
pH, S.U.	6 to 9	
Temperature, °F	140	140
Copper, mg/l	0.25	0.25
Chromium, mg/l	2.0	2.0
Zinc, mg/l	1.4	1.4

COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT ISSUED MARCH 31, 2000.

Parameter	Existing Limits	Proposed Limits
Temperature, maximum	65°F	140 °F
Flow, maximum	100,000 gpd	1300 gpd

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110). All monitoring is required to be at a manhole whose location is to be determined in the outfall plan in the Compliance Schedule.

The monitoring schedule is detailed in the proposed permit under Condition S2 Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

Monitoring for copper, chromium and zinc is being required to further characterize the effluent. These pollutant(s) could have a significant impact on the receiving POTW.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 273-216-110 and 40 CFR 403.12 (e),(g), and (h)).

OPERATIONS AND MAINTENANCE

The proposed permit contains condition S.5. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SPILL PLAN

The Department has determined that the Permittee stores a quantity of chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop best management plans to prevent this accidental release under section 402(a)(1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

The proposed permit requires the Permittee to develop and implement a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs.

COMPLIANCE SCHEDULE FOR MEETING PRETREATMENT STANDARDS

The compliance schedule for this permit requires the planning and construction of a combined wastewater outfall with monitoring equipment.

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with

approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for a term of years corresponding to the permit renewal cycle of Ecology.

REFERENCES FOR TEXT AND APPENDICES

APPENDICES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public notice of application was published on July 12, 2003 and July 19, 2003 in *The Chronicle* to inform the public that an application had been submitted and to invite comment on the reissuance of this permit.

The Department will publish a Public Notice of Draft (PNOD) on July 29, 2003 in *The Chronicle* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, (360) 407-6285, or by writing to the address listed above.

This permit was written by Gary Anderson P.E.

APPENDIX B—GLOSSARY

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD₅--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD₅ is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite"(collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Continuous Monitoring --Uninterrupted, unless otherwise noted in the permit.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater

facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through— A discharge which exits the POTW into waters of the-State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

- a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;

- b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)-- A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)--

1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;

2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids—That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of

various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C – RESPONSE TO COMMENTS

Comment:

The temperature limit exceeds the city ordinance limit. The limit should be 104° F.

Response:

This transposition error is corrected.

Comment:

There is no reason to limit flow for this facility. The treatments plant can accept larger flows.

Response:

The flow limit is eliminated.

Comment:

The treatment plant would like to see daily temperature readings.

Response:

Agreed. The monitoring schedule and the schedule of compliance are modified. A recording, continuous thermometer will be required to be installed along with the flowmeter.

Comment:

The City of Chehalis wastewater treatment superintendent would like to have copies of DMRs sent to the city.

Response:

The permit has been modified to include this requirement.

APPENDIX D – ORDER AND AMENDED ORDER

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF AN) ORDER NO.
ADMINISTRATIVE ORDER) DE 01WQSR-3320
AGAINST I.P. Callison & Sons)

To: Mr. Anthony Ketchum
Manufacturing Manager
I.P. Callison & Sons
799 North National Avenue
Chehalis, WA 98532-2213

This is an Administrative Order requiring I.P. Callison & Sons to comply with Chapter 90.48 of the Revised Code of Washington (RCW) by taking certain actions, which are described below. RCW 90.48.120(2) authorizes the Department of Ecology (Department) to issue Administrative Orders requiring compliance whenever it determines that a person has violated, or is about to violate any provision of RCW 90.48.

The Department's determination that a violation has occurred is based on the following facts:

Violation 1, Failure to Develop and Implement a Stormwater Pollution Prevention Plan: I.P. Callison & Sons is covered by National Pollutant Discharge Elimination System and State Waste Discharge Baseline General Permit for Stormwater Discharges Associated With Industrial Activities Permit Number SO3001617, and has had coverage since November 18, 1992. Condition S.1 of the permit required I.P. Callison & Sons to develop a Stormwater Pollution Prevention Plan (SWPPP) within ninety (90) days of the effective date of permit coverage (February 17, 1993). Best Management Practices (BMPs) identified in the SWPPP that did not require a capital investment were required to be implemented within nine months (August 18, 1993). BMPs identified in the SWPPP that did require a capital investment were required to be implemented within eighteen months (May 18, 1994). I.P. Callison & Sons contacted the Department for help in preparing the SWPPP after receiving a letter from Melodie Selby dated September 26, 2001, requesting that the SWPPP be submitted to the Department no later than October 12, 2001. On October 8, 2001, the Department's Stormwater Inspector visited the I.P. Callison & Sons facility to provide technical assistance for developing a SWPPP and found that a SWPPP had not been developed and BMPs to control discharges of pollutants in stormwater had not been implemented for this business. For these reasons, and in accordance with RCW 90.48.120(2), it is ordered that I.P. Callison & Sons take the following actions.

Corrective Action 1:

Within thirty (30) days of receipt of this Order I.P. Callison & Sons will develop a SWPPP to control discharge of pollutants in stormwater from the business site. Within thirty (30) days of receipt of this order the completed SWPPP shall be submitted by Certified Mail to:

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Marc Pacifico
Industrial Permit Compliance Specialist
WA Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

The Department will review the SWPPP submitted by I.P. Callison & Sons and submit its comments to I.P. Callison & Sons. I.P. Callison & Sons will revise and re-submit the SWPPP within fifteen (15) days of receipt of the Department's comments. I.P. Callison & Sons shall begin implementation of the SWPPP immediately upon the Department's final approval. BMPs that do not require a capital investment shall be put in place immediately. BMPs that require a capital investment shall be put in place within fifteen (15) days of approval of the final SWPPP.

Violation 2, Failure to Submit Discharge Monitoring Reports: A review of the I.P. Callison & Sons files shows that NPDES permit WA0021539, that took effect on June 8, 1995, and expired on July 8, 2000, required I.P. Callison & Sons to monitor its wastewater flow to Salzer Creek on a monthly basis and report the results to the Department quarterly on a Discharge Monitoring Report (DMR). Specifically NPDES permit WA0021539, Condition S3.A., required monitoring results obtained during the previous quarter to be summarized and reported on a form provided, or otherwise approved by the Department, to be submitted no later than the 15th day of the month following the completed reporting period. The permit further specified that reports shall be submitted by April 15, July 15, October 15, and January 15. The current NPDES permit WA0021539 that took effect on June 30, 2000, and expires on June 30, 2005, requires I.P. Callison & Sons to monitor its wastewater temperature and flow to Salzer Creek on a monthly basis and report the results to the Department quarterly. Specifically NPDES permit WA0021539, Condition S3.A., requires monitoring results obtained during the previous three months to be reported on the monthly forms provided, or otherwise approved by the Department, and be received no later than the 15th day of the month following the completed reporting period, unless otherwise specified in the permit. The permit further specifies that the reporting dates for each quarter shall be the working day closest to January 15, April 15, July 15, and October 15. The Department has not received any monitoring results from I.P. Callison & Sons since May 1996. For these reasons, and in accordance with RCW 90.48.120(2), it is ordered that I.P. Callison & Sons take the following actions.

Corrective Action 2:

- I.P. Callison & Sons shall submit the quarterly DMRs for June 1996 through October 2001, and any other overdue DMRs within fifteen (15) days of receipt of this Order.
- I.P. Callison & Sons shall submit all future reports, plans, and other submittals within the time limits required by NPDES Permit number WA0021539. Specifically for DMRs, they shall be received by the Department no later than the fifteenth (15th) day of the month following the completed reporting period. In the future, each DMR that is submitted late will be considered as a separate permit violation and will receive an escalating enforcement response.

Overdue DMRs shall be submitted by Certified Mail to:

Marc Pacifico
Industrial Permit Compliance Specialist
WA Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

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Future monthly DMRs shall be submitted to:

Permit Coordinator
WA Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Violation 3, Failure to Submit Spill Plan: NPDES permit WA0021539, Condition S5., requires I.P. Callison & Sons to submit a Spill Plan to the Department within six months of the effective date of the permit. The spill plan was due December 30, 2000, and was not received. For these reasons, and in accordance with RCW 90.48.120(2), it is ordered that I.P. Callison & Sons take the following actions.

Corrective Action 3:

- I.P. Callison & Sons shall submit the Spill Plan within thirty (30) days of receipt of this Order.
- I.P. Callison & Sons shall submit all future reports, plans, and other submittals within the time limits required by NPDES Permit number WA0021539.

The Spill Plan shall be submitted by Certified Mail to:

Marc Pacifico
Industrial Permit Compliance Specialist
WA Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Violation 4, Failure to Meet Compliance Schedule: NPDES permit WA0021539, Condition S6., establishes a compliance schedule for I.P. Callison & Sons to install a cooling tower to lower the temperature of its discharge to meet the effluent limit of 65°F. The permit contains a table establishing milestone dates to complete certain steps in the process of installing the cooling tower. The permit requires the following: "No later than 14 days following each schedule date the Permittee shall submit to the Department a report including, at a minimum, whether or not it complied with the increment of progress to be met on such date and, if not, the date on which it expects to comply with the increment of progress, the reasons for the delay, and the steps being taken to return the project to the schedule established."

<i>Event</i>	<i>No Later Than</i>
1. Complete design of new cooling tower and submit engineering report to the Department.	January 1, 2001
2. Obtain approval from the Department for an Engineering Report, and Plans And Specifications for the planned treatment facility.	March 1, 2001
3. Purchase equipment and materials.	May 1, 2001
4. Complete Installation of cooling facility.	September 1, 2001
5. Obtain full cooling facility operational status and achieve full compliance.	November 1, 2001

Cooling water is discharged to Salzer Creek a tributary to the Chehalis River, the Chehalis River is listed on the Section 303(d) list as not meeting the water quality criteria for temperature. I.P. Callison & Sons has not complied with NPDES permit WA0021539, Condition S6., none of the five milestone dates

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I.P. Callison and Sons

required to complete the compliance schedule was met, none of the five required reports was received, and construction of the cooling tower has not started. For these reasons, and in accordance with RCW 90.48.120(2), it is ordered that I.P. Callison & Sons take the following actions.

Corrective Action 4: I.P. Callison & Sons is required to construct a recirculating cooling tower that will eliminate the cooling water discharge to Salzer Creek no later than summer 2002. NPDES permit WA0021539 authorizing the discharge of cooling water to Salzer Creek will be terminated on June 30, 2002. To meet the June 30, 2002, deadline I.P. Callison & Sons shall follow the compliance schedule below. No later than 14 days following each schedule date I.P. Callison & Sons shall submit to the Department a report including, at a minimum, whether or not it complied with the increment of progress to be met on such date and, if not, the date on which it expects to comply with the increment of progress, the reasons for the delay, and the steps being taken to return the project to the schedule established.

<i>Event</i>	<i>No Later Than</i>
1. Complete design of new cooling tower and submit an engineering report that meets the intent of Chapter 173.240 of the Washington Administrative Code (enclosed) to the Department.	January 30, 2002
2. Obtain approval from the Department for an Engineering Report, and Plans And Specifications for the planned treatment facility.	March 1, 2002
3. Purchase equipment and materials.	April 1, 2002
4. Complete Installation of cooling facility.	June 1, 2002
5. Obtain full cooling facility operational status and terminate all discharges to Salzer Creek.	June 30, 2002

The five (5) progress reports shall be submitted by Certified Mail to:

Marc Pacifico
Industrial Permit Compliance Specialist
WA Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Violation 5, Unpermitted Discharges to Salzer Creek: During the October 8, 2001, site visit the Department's Stormwater Inspector observed an outdoor drum washing operation that appeared to be discharging to a storm sewer. A follow up investigation by the City of Chehalis confirmed that the discharge was to a storm sewer. The Stormwater Inspector suspected that several other discharges (boiler blowdown and floor drains) also were directed to the storm sewer. I.P. Callison & Sons files show that on December 28, 1998, I.P. Callison & Sons submitted a renewal application for National Pollutant Discharge Elimination System (NPDES) permit WA0021539. The cover letter that accompanied the application package requests that the permit be renewed for a discharge of non-contact cooling water only, and this is the only discharge flow listed in the application for the discharge to Salzer Creek, a water of the state. A previous permit application in the file, dated November 17, 1994, also indicates that the only discharge to Salzer Creek is non-contact cooling water. A site diagram (dated August 17, 1994) included in the November 17, 1994, application package shows discharges from drum washing, boiler blowdown, floor drains, a cooler drain, and two condensate drains all directed to Salzer Creek. For these reasons, and in accordance with RCW 90.48.120(2), it is ordered that I.P. Callison & Sons take the following actions.

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I.P. Callison and Sons

Corrective Action 5: I.P. Callison & Sons shall immediately cease all unpermitted discharges to Salzer Creek including, but not limited to, discharges from drum washing, boiler blowdown, and floor drains. These discharges shall be collected in a tanks (stationary or portable) and hauled by a contractor to an acceptable disposal site (delegated sewage treatment plant or hazardous waste treatment, storage and disposal facility) until such time as a State Waste Discharge Permit is issued authorizing these discharge to go to the sanitary sewer.

- Within thirty (30) days of receipt of this Order I.P. Callison & Sons shall submit the following documentation to the Department:
 - Documentation that all discharges to Salzer Creek, except non-contact cooling water, have ceased and are being collected in tanks and stored for disposal.
 - Name and address of the contractor who is hauling the wastewater off the site.
 - Name and address of the disposal facility that is accepting the wastewater.
- Within sixty (60) days of receipt of this Order I.P. Callison & Sons shall submit a complete State Waste Discharge Permit Application (form enclosed) to the Department. The State Waste Discharge Permit Application will be for all discharges from I.P. Callison & Sons operation to be directed to the City of Chehalis sanitary sewer system. All discharges to Salzer Creek will cease no later than June 30, 2002.

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

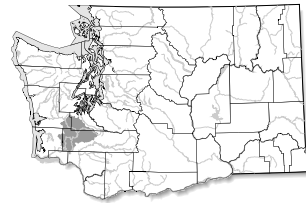
This Order may be appealed. Your appeal must be filed with the Pollution Control Hearings Board, P.O. Box 40903, Olympia, Washington 98504-0903 within thirty (30) days of your receipt of this Order. At the same time, your appeal must also be served on the Department of Ecology, Fiscal Office, P.O. Box 47615, Olympia, Washington 98504-7615. In addition please send a copy of your appeal to Marc Pacifico, Department of Ecology, Southwest Regional Office, P.O. Box 47775, Olympia, Washington 98504-7775. The notice of appeal shall contain a copy of the order or decision appealed from, and if the order or decision followed an application, a copy of the application. Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320. These procedures are consistent with Chapter 43.21B RCW.

DATED this _____ day of _____, 2002, at Olympia, Washington.

Kelly Susewind, P.E.
Southwest Region Manager
Water Quality Program

REGISTERED MAIL

Mr. Anthony Ketchum
Manufacturing Manager
I.P. Callison & Sons
799 North National Avenue
Chehalis, WA 98532-2213



Your address
is in the
**Upper
Chehalis**
watershed

Dear Mr. Ketchum:

Re: Administrative Order DE 01WQSR-3320A-01, First Amendment

On March 7, 2002, the Department of Ecology (Department) received the Application for Relief package from Gregory C. Biza, dated March 5, 2002, stating that the package should be considered as an appeal of Penalty DE 01WQSR-3316 and Administrative Order DE 01WQSR-3320. On March 11, 2002, Marc Pacifico called you and advised you that the Application for Relief could not be considered because it was due on March 1, 2002, and had not been received on time. Mr. Pacifico advised you that the appeal also could not be considered because it had not been submitted to the Pollution Control Hearings Board (PCHB). You were advised to re-submit the package to the PCHB as an appeal of both the Penalty and the Order, and to include a copy of the original Notice of Penalty and Order with the package. Mr. Pacifico also advised you that the package would need to be submitted to the PCHB no later than March 18, 2002. Both the Department and the PCHB do not have any record of the package being re-submitted as an appeal. This letter is to advise you that the Department considers the Penalty and Order to both be in effect and that the \$24,000.00 Penalty payment due March 18, 2002 is overdue.

The Department has reviewed the March 5, 2002, submittals for compliance with the Corrective Action requirements of Administrative Order DE 01WQSR-3320.

- Corrective Action 1, Develop and Implement a Stormwater Pollution Prevention Plan:

The Stormwater Pollution Prevention Plan and Spill Plan submitted on March 5, 2002, meets the Corrective Action requirements with the exception that any empty drums that contain product residue must be stored under cover with secondary containment to prevent exposure to stormwater.

- Corrective Action 2, Submit Discharge Monitoring Reports:

The Discharge Monitoring Reports submitted on March 5, 2002, meet the Corrective Action Requirement. Every Discharge Monitoring Report between July 2000 and October 2001 exceeded the average and maximum effluent limits for temperature.

- Corrective Action 3, Submit a Spill Plan:

The Spill Plan submitted on March 5, 2002, needs to be revised to include a description of federal, state, and local regulatory authorities that need to be notified in the event of a spill. A list of all oil and chemicals used, processed, or stored at the facility which may be spilled into state waters must be

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included in the Plan. A list of contractors, with telephone numbers, to contact for clean-up of spilled materials also needs to be included in the Plan.

- Corrective Action 4, Compliance Schedule to Install a Cooling Tower:

The proposal for the cooling tower/chiller equipment proposed on March 5, 2002, is an acceptable means of eliminating the cooling water discharge to Salzer Creek. The six month extension for completing the project is also acceptable. This being the case, the Department will not terminate National Pollutant Discharge Elimination System Permit WA0021539 until December 31, 2002. An amendment to Administrative Order DE 01WQSR-3320 is enclosed with this letter to formalize the new schedule for installing the cooling equipment and eliminating the cooling water discharge.

- Corrective Action 5, Eliminate Unpermitted Discharges to Salzer Creek:

The information provided in your March 5, 2002, package is acceptable documentation that unpermitted discharges to Salzer Creek have been eliminated. Drum washing discharges have been directed to the City of Chehalis sanitary sewer system effective November 2, 2001. Boiler blow down discharges are being redirected from surface water while the discharge is being evaluated for connection to the sanitary sewer, or for contractor disposal. Floor drains have been plugged until it can be determined if they are connected to the sanitary sewer or if this connection will need to be established.

Please advise the Department once approval is received from the City of Chehalis for disposal of boiler blow down to the sanitary sewer. If a contractor will be used for blow down disposal, please provide this information to the Department at the time that the contract is signed. Please advise the Department once a final determination has been made regarding whether the discharges from the storm drains are currently routed to the sanitary sewer, or whether this connection will be established.

Your State Waste Discharge Permit Application was due on April 15, 2002. If you have submitted it please disregard this reminder. If you have not submitted the State Waste Discharge Permit Application please do so within one week of receipt of this letter.

All correspondence relating to this document should be directed to Marc Pacifico at Department of Ecology, Southwest Regional Office, P.O. Box 47775, Olympia, Washington 98504-7775. If you have any questions concerning the content of the document, please call Marc Pacifico at (360) 407-6282. If you wish to formally contest the Amended Order you must follow the procedures described in the document. Any notice of appeal shall contain a copy of the order or decision appealed from, and if the order or decision followed an application, a copy of the application.

Sincerely,

Kelly Susewind, P.E.
Southwest Region Manager
Water Quality Program

KS:MAP:le(enforce/order)
Enclosure

cc: Gary Anderson, Ecology
Marilou Pivrotto, Ecology
Leann Ryser, Ecology
Eric Trovillo, Ecology

FACT SHEET FOR STATE WASTE DISCHARGE PERMIT NO. ST 6188
I.P. Callison and Sons

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF THE COMPLIANCE BY)
I.P. Callison & Sons) ORDER NO.
with Chapter 90.48 RCW and the) DE 01WQSR-3320A-01
Rules and Regulations of the) FIRST AMENDMENT
Department of Ecology)

To: Mr. Anthony Ketchum
Manufacturing Manager
I.P. Callison & Sons
799 North National Avenue
Chehalis, WA 98532-2213

Order No. DE 01WQSR-3320, dated February 13, 2002, is hereby amended as follows.

Corrective Action 4 is replaced with the following:

I.P. Callison & Sons is required to construct a cooling system that will eliminate the cooling water discharge to Salzer Creek no later than December 31, 2002. NPDES permit WA0021539 authorizing the discharge of cooling water to Salzer Creek will be terminated on December 31, 2002. To meet the December 31, 2002, deadline I.P. Callison & Sons shall follow the compliance schedule below. No later than 14 days following each schedule date I.P. Callison & Sons shall submit to the Department a report including, at a minimum, whether or not it complied with the increment of progress to be met on such date and, if not, the date on which it expects to comply with the increment of progress, the reasons for the delay, and the steps being taken to return the project to the schedule established.

<i>Event</i>	<i>No Later Than</i>
1. Complete design of new cooling system and submit an engineering report that meets the intent of Chapter 173.240 of the Washington Administrative Code to the Department.	June 28, 2002
2. Obtain approval from the Department for an Engineering Report, and Plans And Specifications for the planned cooling system.	August 30, 2002
3. Purchase equipment and materials.	September 27, 2002
4. Complete installation of cooling system.	November 29, 2002
5. Obtain full cooling system operational status and terminate all discharges to Salzer Creek.	December 31, 2002

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I.P. Callison and Sons

The five (5) progress reports shall be submitted by Certified Mail to:

Marc Pacifico
Industrial Permit Compliance Specialist
WA Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

No other condition or requirement of Administrative Order No. DE 01WQSR-3320 is hereby affected by this amendment.

This Order may be appealed. Your appeal must be filed with the Pollution Control Hearings Board, P.O. Box 40903, Olympia, Washington 98504-0903 within thirty (30) days of your receipt of this Order. At the same time, your appeal must also be served on the Department of Ecology, Fiscal Office, P.O. Box 47615, Olympia, Washington 98504-7615. In addition please send a copy of your appeal to Marc Pacifico, Department of Ecology, Southwest Regional Office, P.O. Box 47775, Olympia, Washington 98504-7775. The notice of appeal shall contain a copy of the order or decision appealed from, and if the order or decision followed an application, a copy of the application. Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with Revised Code of Washington (RCW) 43.21B.320. These procedures are consistent with Chapter 43.21B RCW.

DATED this _____ day of _____, 2002, at Olympia, Washington.

Kelly Susewind, P.E.
Southwest Region Manager
Water Quality Program

FACT SHEET FOR STATE WASTE DISCHARGE PERMIT NO. ST 6188
I.P. Callison and Sons

APPENDIX E – SITE MAP

